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6 Plaintiff in Pro Per

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8 UNITED STATES DISTRICT COURT
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10 CENTRAL DISTRICT OF CALIFORNIA
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12 MARC WOLSTENHOLME,
13 Plaintiff,
14 vs.
15 RIOT GAMES, INC.,
16 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

In Support of Request PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION
TO DISMISS PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 12(B)(6)
AND MOTION FOR A MORE DEFINITE
STATEMENT PURSUANT TO RULE 12(E)

DATE: FEBRUARY 13, 2025
TIME: 10:00 A.M.
CRTRM: 6D

COMPLAINT FILED: OCTOBER 31, 2024
DEFAULT JUDGMENT FILED JANUARY
07, 2025.
COMPLAINT - SHORT FORM: JANUARY
01, 2025
AMENDED COMPLAINT FILED:
JANUARY 04, 2025- ACCEPTED:
JANUARY 10, 2025

Dated this 11.01.2025

M. Wolstenholme.

[MARC WOLSTENHOLME]

1 **I, Marc Wolstenholme, declare as follows:**

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3 **1. Background and Introduction**

4 I am the plaintiff in this case against Riot Games, Inc., regarding copyright
5 infringement and unauthorized use of original materials derived from my manuscript
6 "Bloodborg" and related works. I submit this declaration to provide evidence supporting my
7 request for damages and to outline the profound and ongoing impact of the defendant's actions.
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10 **2. Overview of Infringement**

11 In early 2020, I submitted my manuscript "Bloodborg" to Riot Forge, Riot Games'
12 subsidiary, which was soliciting story-driven content for its gaming and multimedia initiatives.
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14 The manuscript contained unique narrative elements, character arcs, thematic
15 developments, and psycho-emotional frameworks drawn directly from my personal trauma and
16 medical records.

17 Subsequent to the submission, Riot Games' animated series Arcane began
18 development and ultimately premiered on Netflix. Upon review of Arcane, it became evident
19 that numerous narrative elements, character designs, plot structures, and aesthetic choices bore
20 striking similarities to the contents of my manuscript.
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3. Evidence of Direct Infringement

I have cataloged and submitted over 100 instances of direct infringements which Arcane utilizes which accounts for a tiny fraction of the wider infringement:

Unique character dynamics and origin stories.

Themes and narrative frameworks mirroring those in "Bloodborg."

Psychological and emotional states identical to those described in my manuscript.

Many of these infringements not only mirror my work's aesthetic and narrative but also align with proprietary trauma-based storytelling elements unique to my personal experiences and writings.

4. Damages and Impact on My Creative Endeavors

As a direct result of the unauthorized use of my intellectual property, I have been unable to secure publishing or production deals for my interconnected M.W. Wolf Megaverse of Fiction and MegaGen Universe, a literary and multimedia intellectual property containing over 600 unique characters. Moreover, I'm so devastated by the nature of these infringements that I have not been able to maintain writing during this period.

The M.W. Wolf Megaverse, which had the potential to span novels, films, animated series, and games, was sidelined due to the market saturation caused by Arcane, which has benefited from my concepts.

Arcane has established Riot Games as a leader in animated narrative content, thereby monopolizing the market segment I was actively pursuing and diminishing my opportunity to compete fairly.

1 **5. Financial Loss and Competitive Harm**

2 Arcane's two seasons reportedly cost approximately \$250 million to produce and
3 market, though publicly available figures remain inconsistent.

4 Revenue streams from licensing to platforms such as Netflix and Tencent
5 amounted to roughly \$108 million (\$3 million per episode from each). However, these figures
6 reflect only direct licensing and do not account for the loss-leader strategy employed by Riot
7 Games.

8 The real financial benefit to Riot Games extends beyond direct sales and
9 licensing, including:
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11 Increased player engagement and monetization within League of Legends and
12 related games.

13 The introduction of more profitable characters derived from Arcane into their
14 games.

15 Enhanced profitability from in-game purchases, skins, and cosmetics inspired by
16 the Arcane series.

17 Rectification of previously inconsistent in-game lore, now anchored by Arcane's
18 success.

19 The ongoing success of Arcane serves as a springboard for future cinematics,
20 spin-offs, and games, resulting in exponential future profits at my expense.

6. Riot Games Products Related to Arcane

Riot Games has expanded the Arcane universe across multiple platforms and products, both within their own games and through collaborations with other franchises like Fortnite. Here's a comprehensive list of Arcane-related content and merchandise:

6a. League of Legends (LoL):

Arcane Skins:

Arcane Jinx

Arcane Vi

Arcane Caitlyn

Arcane Jayce

In-Game Events:

Arcane-themed events featuring missions and rewards.

New Champion:

Ambessa Medarda, introduced as Mel Medarda's mother from Arcane.

Mel Medarda

POLYGON

6b. Teamfight Tactics (TFT):

Arcane-Themed Set:

Features characters like Powder (child version of Jinx) and other Arcane-themed units.

Cosmetics:

Arcane-themed Little Legends and Arena skins.

1 *6c. Legends of Runeterra (LoR):*

2 New Cards:

3 Introduction of Arcane characters and storylines.

4 Events:

5 Legends of Arcane event with exclusive rewards.

6 *6d. VALORANT:*

7 Arcane Collector's Set:

8 Includes weapon skins, player cards, gun buddies, and sprays inspired by Arcane.

9 VALORANT

10 *6e. Merchandise:*

11 Riot Games Store:

12 Arcane-themed apparel, accessories, and collectibles.

13 Example: Arcane Blue Rose Necklace.

14 RIOT GAMES MERCH

15 Collaborations:

16 Fenty Beauty x Arcane makeup collection.

17 LICENSE GLOBAL

18 GKIDS Arcane: Season One 4K UHD Collector's Edition Set.

19 RIOT GAMES MERCH

6f. Collaborations with Other Games

6f1. Fortnite:

Arcane: League of Legends Set:

Arcane Jinx Outfit.

Arcane Vi Outfit.

Matching back blings, pickaxes, emotes, and loading screens.

FORTNITE WIKI

6f2. Other Potential Collaborations:

While Fortnite is a notable example, Riot Games may explore future collaborations to expand Arcane's presence in other gaming universes.

Additional Notes

Availability:

Some items, especially in-game skins and cosmetics, may be time-limited or part of special events.

6f3. Future Releases:

With the ongoing popularity of Arcane, Riot Games continues to develop new content and merchandise related to the series.

For the most current information and availability.

1 ***7. Spin-Off Series and products.***

2 7a. On 07/01/2025 Riot released a new cinematic (Welcome to Noxus - Bite
3 Marks (ft. TEYA) | 2025 Season 1 Cinematic - League of Legends).as part of the 2025 Season 1
4 launch for League of Legends. This cinematic serves as an epilogue to Arcane, transitioning the
5 narrative focus to the Noxus region within the game's universe. In this cinematic, Mel Medarda
6 plays a central role, traveling from Piltover to the Immortal Bastion in Noxus, seeking answers
7 and engaging with key Noxian figures. This cinematic marks the beginning of Arcane moving to
8 different regions. I allege that Arcane is stolen from Bloodborg, thus the continuation from
9 Arcane, no matter how much the story moves on from my writing, has the foundations of
10 Arcane, thus I allege it's all linked and all from the foundations of my IP which has been
11 infringed upon and continues to be infringed upon. Moreover, Mel is central to this cinematic
12 and is clearly central to Riot's plans moving forward. Mel is the white eyed child of great
13 importance from Bloodborg. It's confirmed in both Arcane and the Blood Sweat & Tears ft.
14 Sheryl Lee Ralph music video.
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19 7b. *The Blood Sweat & Tears ft. Sheryl Lee Ralph music video* is an origin /
20 backstory of Ambessa and Mel Medarda. I further allege that the official music video "Blood
21 Sweat & Tears" by Riot Games, featuring Sheryl Lee Ralph, derives directly from elements of
22 "Bloodborg: The Harvest."
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1 *7c Planned Spin-Off Series*

2 Noxus Series:

3 Focus: Exploration of the militaristic and expansionist nation of Noxus, delving
4 into its internal politics and key characters.
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6 Status: In development; not yet in full production.

7 Ionia Series:

8 Focus: Centered on the mystical and spiritual region of Ionia, highlighting its rich
9 culture and conflicts.
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11 Status: In the development phase.

12 Demacia Series:

13 Focus: Explores the kingdom of Demacia, known for its strict moral code and
14 anti-magic stance.
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16 Status: Undergoing development.

17 These projects aim to expand the League of Legends universe by focusing on
18 different regions and characters beyond those featured in Arcane. Yet Arcane made these spin-
19 offs possible and are the foundations of Riot's entry into Animation, movies, TV and extended
20 storytelling narratives of many kinds.
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1 **8. Settlement Efforts**

2 I have issued Riot Games with two without prejudice save to costs letters,
3 outlining settlement demands ranging between £10 million to £100 million for out-of-court
4 resolution.
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6 In the absence of settlement, I am pursuing damages in the amount of £1.5 billion
7 in court to reflect the cumulative financial and competitive and emotional harm caused by Riot
8 Games' infringement.
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10 **9. Anti-Competitive Practices and Netflix Involvement**

11 I have observed that Netflix has been a consistent platform for unauthorized and
12 derivative content bearing similarities to works I have previously submitted to Riot Forge and
13 Curtis Brown, UK. Netflix and Riot Games have been given three years of warnings, complaints,
14 notices of the impact these infringements were having on my welfare and financial wellbeing,
15 and they have been issued with many cease-and-desist notices, Pursuant to Title 17 of the United
16 States Code. They have ignored all of these attempts, and they have threatened and gaslighted
17 me in response and retaliation. This recurring pattern suggests anti-competitive behavior,
18 restricting my ability to enter the multimedia entertainment market, thereby violating fair market
19 competition principles.
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10. Intentional Infliction of Emotional Distress (IIED): California Civil Code

§ 1708:

10a. In 2021, Riot Games, via their attorney (Aaron J. Moss of Greenberg Glusker), threatened me, the Plaintiff (M.W. Wolf) a former British Soldier, with debilitating legal fees after being informed of my complex PTSD and comorbid conditions and disabilities as a vulnerable adult, and the emotional impact this case being unnecessary prolonged by deception, would have on my wellbeing. I argue that this is a retaliation and coercion strategy which has long been a concern with Riot Games, both legally and ethically.

10b, Intimidation, threats and pressure shows a reckless disregard for the emotional and mental harm caused, and likely to further exacerbate, if this course of action continued, which it did. I felt abused, scared and alone, and small and vulnerable. This was an extremely traumatic period, during which I almost ceased to be alive several times. It should be noted that my work in question, and indeed the whole of the M.W. Wolf catalogue of fiction, is deeply emotional, fractured and complex trauma writing to help me cope with very dark and disturbing mental illness. And now it sits visible for all to see in Arcane, in a creative and pseudo-moralistic framework in which it wasn't intended to be viewed and misused to mask over equality and discrimination concerns at Riot Games. Thus, my trauma writing was also abused and misused and oppressed, it caused considerable damage to my wellbeing, far darker and more disturbing than any human being should have to carry.

1 10c. Whilst this IP case against Riot Games did not cause my complex PTSD nor
2 comorbid disabilities, it did worsen them and make me feel that the entire world was against me
3 and that everybody in the world must be oppressive cheaters. This has specific links to triggers
4 of past traumas. After receiving the letter from the Defendant's attorney at Greenberg Glusker, I
5 was wrongly led to believe life and this case were worthless and should end, and both were going
6 to cause even more stress and trauma and financial hardship if I pursued justice.
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9 10d. Because of a misleading letter sent by Riot Games's attorney, the Plaintiff
10 was scared to pursue the case in 2021. Aaron J. Moss of Greenberg Glusker, acting on behalf of
11 Riot Games, wrote:
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13 "It is instead Riot that would be able to recover any attorney's fees it is required
14 to expend defending any of your frivolous claims. Please understand that this means that if you
15 pursue legal action against Riot you will be exposing yourself to substantial monetary liability.
16 Riot will not hesitate to pursue all available legal remedies in connection with your allegations.
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18 Our law firm regularly defends cases like yours and courts invariably dismiss
19 them at the outset of the lawsuit. We have no doubt that the same result would obtain were you
20 to pursue your baseless claims.
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22 I note that you have stated in your correspondence that you do not want the stress
23 of having to fight for years over your supposed copyright claims. Because your allegations of
24 infringement are entirely misguided and based on a serious misunderstanding of copyright law, I
25 urge you to follow your own advice and not waste any more of your energy pursuing these
26 meritless allegations."
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1 10e, Furthermore, Riot Games, via their attorney, attempted to cause further harm,
2 stress and confusion to me by falsifying a timeline which they knew to be false and knew would
3 misrepresent their position to evade lawful early settlements. It can be shown that the
4 information and timeline presented by the attorney was false and misleading.
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7 10f. Bad Faith Negotiations- Threatening legal fees after being informed about
8 my emotional and mental health condition, as well as the false information of the timeline of
9 production, is acting in bad faith. Though legal fees are often a part of civil cases, using this as a
10 tactic in response to my condition crosses ethical boundaries. I, now in a more stable state of
11 mind and condition, understand I was misinformed of the Fee-shifting laws. This bad conduct,
12 inappropriate and abusive behaviors have long been a business strategy of Riot Games. The
13 threats of retaliation and the coercion- legal fees and false timelines- which were taken to force
14 the Plaintiff into dropping the case under pressure and lies is inappropriate conduct, especially
15 when one party (The Plaintiff) is clearly more vulnerable and likely to be harmed and misled. I
16 assert that this needs to be further examined both legally and ethically, and in conjunction with
17 The California Civil Rights Department (CRD).
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21 10g. Since talking out about Riot's alleged theft, I have received much hate mail,
22 including a bomb threat and gaslighting. I have been discriminated against, and my 5-year-old
23 daughter has been targeted with threats of sending AI child porn of her to her school and to her
24 mother. I have been called many names. The things being said and sent over emails to my
25 website, from both Riot and Fortiche and from the unhealthy, toxic and dangerous community
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1 Riot fosters, are perceived to be horrendous, retaliatory and threatening. Most of it is directed at
2 my mental health, gaslighting, telling me that I'm mad, presenting all kinds of fake timelines
3 dating back to 2012, threatening to steal more of my work and calling me a Transphobic Racist
4 Loser, as well as Christian Linke condoning murder on X, saying that Fortiche should bring back
5 the guillotine. This is all bad, but the worst is targeting of the time lost with my daughter. One of
6 the hate mail emails said, "this is why family court took your daughter lmao you are deranged
7 af."

9 **11. Pre-litigation discovery, request for in person meeting, and removal to**
10 **federal court**

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12 11a. I have attested many Pre-litigations discovery requests which have been
13 ignored.

14 11b. The defendant's representative (Josh Geller) glossed over the Rule 7-3 Meet
15 and Confer, trying to hide it among an email of deflection, whilst ignoring my request to have a
16 proper and lawful Meet and Confer in person to discuss matters. Moreover, he keeps threatening
17 that he is going to get the case kicked out right from the off without even considering my case
18 nor investigating it, not allowing the court to investigate it, and not even allowing me to respond
19 to this and not using the correct channels, while not accepting my complaints. He did this on the
20 days he knew I was in very emotional and traumatic cases in the UK, after I asked him not to
21 contact me on these days, which I allege is a deliberate attempt to cause harm and pressure. This
22 again shows a pattern of Bad Faith Negotiations.
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1 11c. The defendant's representative (Josh Geller) claims to have had these cases
2 removed from the state court to federal court against my will and without 30 days' notice for me
3 to file a motion against this. Furthermore, the case number he gave me (case number is 2:25-cv-
4 00053.- Marc Wolstenholme v. Riot Games, Inc) did not show up live when I checked with the
5 court and on my PACER. I have just spoken to the LA Superior Clerk. She told me that this case
6 has not been moved to Federal court. This case is still scheduled for a case management hearing
7 on the 28th of April 2025 at 8AM in department 20 of the LA Superior, Stanley Mosk. The court
8 clerk further stated that I can attend remotely if I please. I am not yet sure if I will be attending in
9 person or remotely. The court clerk further stated that a case cannot be switched over in this
10 manner, she stated that it would have to be agreed upon. I have not received any notice nor
11 official motions nor letters or notices from the defendant's representative (Josh Geller) nor from
12 the court. Moreover, my submission of my narrative complaint is still live with the LA
13 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES, STANLEY MOSK
14 COURTHOUSE. I believe there are legal shenanigans at play, or lies, or possibly a
15 misunderstanding or delay in updates.

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19 Either way, it is clear that there is a deficit and perhaps failure in the
20 communications thus a case management hearing and state intervention and protections are
21 needed to prevent myself, who is clearly a vulnerable person in this case, from being bullied and
22 exposed to more harm from Riot's behaviors. Furthermore, the case is where I want it to be and
23 as soon as I have a court official motion, I have 30 to 40 days to counter the motion by law.
24 Moreover, I have not received a proper and official reply to the Summons. I have not received
25 any reply to the Pre-litigation discovery and request for an in-person meeting. I have left several
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1 answer phone messages and missed calls at Mr. Geller's office which have not been returned. He
2 has stated that he will take a call, perhaps tomorrow or later in the week but given the way this
3 case has been conducted, I do not see a way in which I can have a fair and honest trial without
4 injustice unless I have a level of protection to prevent more harm and shenanigans and legal
5 tricks to cheat me out of justice.
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8 **12. The four Cases**

9 *U.S. Copyright Act (17 U.S.C. § 501)*

10 *(Case 1 & 2)*

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12 12a, Copyright Infringement (17 U.S.C. § 501): This is the primary cause of
13 action against Riot Games unlawfully copying and using the Plaintiff's (M.W. Wolf) copyrighted
14 material without permission.

15 12b, Vicarious Copyright Infringement (17 U.S.C. § 501): This is an additional
16 cause of action as Riot Games benefited financially from third parties (such as modders, Netflix,
17 Tencent Games and Fortiche Production SAS, and others) who infringed on the Plaintiff's (M.W.
18 Wolf) copyright with Riot Games' knowledge, and they continue to benefit financially even after
19 the IP infringement concerns were raised. Furthermore, Riot Games continues to profit from
20 aesthetics, skins and characters and the lore they have created from Bloodborg.
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Case Law-

Shapiro, Bernstein & Co. v. H.L. Green Co., 316 F.2d 304 (2d Cir. 1963): This case established that a party can be vicariously liable for copyright infringement if they benefit financially and have control over the infringing activity.

Fonovisa, Inc. v. Cherry Auction, Inc., 76 F.3d 259 (9th Cir. 1996): This case confirmed that a party who profits from infringing activity and has the ability to control it can be held vicariously liable.

California Business and Professions Code § 17200

Unfair Competition Law (UCL)

(Case 3)

12c, Unfair Competition (17 U.S.C. § 501): Under California State law. Riot Games engaged in unfair competition by unlawfully using the Plaintiff's (M.W. Wolf) copyrighted material without permission, thereby gaining an unfair advantage in the market and causing harm to the Plaintiff's (M.W. Wolf) business, and person. The unauthorized use of the Plaintiff's (M.W. Wolf) intellectual property affected M.W. Wolf's brand reputation, preventing a full launch, harming both wellbeing and financial standing of his person and business, preventing him from earning which kept him subjugated. Customers have been misled into believing that the plaintiffs copyrighted material was part of Riot Games' legitimate offerings.

1 12d, Unfair Business Acts or Practices- Riot Games' unauthorized use of the
2 Plaintiff's (M.W. Wolf) intellectual property constitutes an unfair business practice.
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4 12e, Unlawful Acts and Expansion - The UCL allows plaintiffs to "borrow"
5 violations of other laws, including copyright law. Riot Games' copyright infringement constitutes
6 an unlawful act under California Business and Professions Code § 17200, thereby establishing a
7 UCL violation based on the underlying copyright infringement. Riot Games' use of Plaintiff's
8 (M.W. Wolf) copyrighted material without permission not only violates federal copyright law
9 but also gives them an unfair advantage over the Plaintiff's (M.W. Wolf) business, allowing
10 them to gain increased market share and revenue unlawfully.
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14 12f, Fraudulent Business Acts or Practices: Riot Games' actions were deceptive in
15 a way that misled customers and the public. Riot Games misrepresented their ownership of the
16 Plaintiff's (M.W. Wolf) content. Furthermore, Riot Games engaged in actions to conceal
17 material and misrepresent timelines of production to fraudulently evade the Plaintiff's (M.W.
18 Wolf) claims.
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20 *Intentional Infliction of Emotional Distress (IIED): California Civil Code § 1708:*

21 *(Case 4)*
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13. Background.

Key Pre-Litigation Background and concerns of the Plaintiff.

Riot Games' bad faith actions, retaliatory threats, and lack of cooperation.

13a. Pre-litigation History- Furthermore, the Plaintiff has made many early negotiations and pre-litigation discovery attempts to aid the court, save costs and prevent unnecessary time, hardship and stress. These include out of court settlements, cease and desist attempts, and information requests. All have been met with disregard or ignored entirely. Riot Games haven't taken the time to investigate nor understand the Plaintiff's position, complaints nor claims. The correspondence they did send contained lies and retaliation threats. This Is concerning, given their history and the damage they have caused to the public, workforce of California, the gaming culture and the economic reputation of the state of California. This again shows bad faith negotiations and a blatant, nonchalant attitude towards civil litigation processes, the harm they cause to the public on the global scale, and to smaller, vulnerable competitors.

13b. Pattern of Exploitative and Harmful Conduct- Since their inception, I can demonstrate that Riot Games has engaged in a consistent pattern of wrongful behaviour and harmful conduct toward smaller competitors and vulnerable individuals. This consistent pattern includes IP theft, abusive and retaliatory subjugation of those they see as worth less than themselves, such as vulnerable adults, child voice actors and women. Riot Games has shown a pattern of behaviour targeting smaller, vulnerable individuals and competitors. Examples include their actions against a young Ukrainian artist, swipe and sabotage of code and data from Defense of the Ancients (DotA), class action lawsuits of gender discrimination in pay and promotion, sexual harassment, and retaliation against women working at Riot offices in California, and of course the refusal to address the plaintiff's claims of IP infringement in this current case.

1 13c. Call for Broader Accountability- Based on Riot Games' past legal issues,
2 such as the \$100 million settlement for sex discrimination and harassment, the harm and
3 financial loss they caused the independent young female Ukrainian artist on TeePublic, the toxic
4 “bromancing” foundations, allegations of sabotage of a rivals website and stealing of code, the
5 data harvesting business model, allegations of adversary spyware in the US and around the
6 globe, privacy and data concerns, what can be described as spurious IP wars, loot box gambling
7 allegations, labour disputes, employee walkouts and forced arbitration clauses, monopolisation
8 allegations, anti-competitive behaviours, aggressive competitive strategies... and of course, their
9 behaviour toward the Plaintiff in this case. Thus the Plaintiff argues that this reflects a broader
10 corporate culture of exploitation, bad faith, lies, and disregard for ethical business practices.

11 13d., State reputational harm, and further harm to global culture and public
12 safety- The Chinese conglomerate Tencent were invested in Riot Games from the launch of
13 league of Legends in 2009, if not long before. They owned a majority stake just a little over a
14 year later. By 2015 they fully owned Riot Games. Indeed, since Tencent's full acquisition of Riot
15 Games in 2015, Riot Games has faced multiple high-profile lawsuits, resulting in ongoing
16 lawsuits and complaints every single year of their ownership. This indicates malign and
17 concerning cultures still present and proliferating at Riot Games. The state of California faces
18 reputational damage and harm to its citizens and culture, just like the plaintiff has.

19 The Plaintiff argues that this is pertinent to the current case because the alleged
20 use of the Plaintiff's manuscript of Bloodborg to build Arcane created a \$1.5 billion gateway for
21 Riot Games and their parent company Tencent, to branch into the animation and film industry,
22 where they now have a significant equity investment in the French based company Fortiche
23 Production. The Plaintiff argues that Riot Games has been shown to not be able to act in a
24 civilised lawful manner in the gaming industry and to allow them to misuse his work to branch
25 into film, is potentially damaging and dangerous to this industry, given the casting couch culture
26 and the concerns for Riot's existing behaviours towards women. The Plaintiff argues this IP

1 infringement has given Tencent a wider access to data, an unfair advantage, a global security
2 concern and a wider opportunity to expand into other industries which were not forged honestly.

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4 13e, Moral and ethical obligation of the plaintiff, Riot Games and The Five Eyes
5 (FVEY) intelligence alliance- Tencent has faced scrutiny for its connections to the Chinese
6 government, including concerns about its potential links to the Chinese military. The Chinese
7 government has been actively pursuing a policy known as Military-Civil Fusion (MCF), which
8 encourages collaboration between private companies and the military. This policy is designed to
9 leverage private sector advancements, particularly in technology, for military purposes. Tencent,
10 one of China's largest tech companies, operates under China's regulatory environment, which
11 requires companies to comply with government directives, including the potential sharing of data
12 and technology that could be used for national security or military purposes. Under China's
13 National Security Law, companies like Tencent are required to cooperate with intelligence and
14 security agencies if requested. This law has raised concerns internationally that data collected by
15 Tencent through its services, including gaming platforms like Riot Games, could be accessed by
16 the Chinese government or even the military for surveillance and other purposes.

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17 In 2020, the U.S. government expressed concerns about Tencent's data practices.
18 Tencent has been involved in AI research and technological advancements that could have dual-
19 use applications, both civilian and military, as China continues to focus on developing AI for
20 defence purposes. While there is no direct evidence that Tencent is working with the Chinese
21 military in a traditional defence capacity, its compliance with Chinese laws like the National
22 Security Law and its role in the country's Military-Civil Fusion (MCF) strategy raise concerns
23 about its indirect ties. Tencent is subject to government directives that may require it to share
24 data or technology with state and military authorities. These concerns have been noted by
25 governments outside China, particularly in the U.S., which has scrutinized Tencent's data
26 practices and potential national security risks.

1 The plaintiff, the State of California and Riot Games have ethical and moral
2 obligations to ensure that their work, business strategies and data sharing does not place any
3 person or business in The Five Eyes (FVEY) intelligence alliance countries, and indeed the
4 wider world, into the path of harm or exposure to exploitation of data, algorithmic intelligence
5 gathering or espionage. Whilst the Plaintiff is absolutely in no way accusing Riot Games or
6 Tencent of these activities, he is stating that he cannot be sure that, given the Military-Civil
7 Fusion policy of the Chinese Government, he isn't certain, nor confident that his work, infringed
8 upon by Riot Games, hasn't inadvertently created an avenue for exploitation of data, an unfair
9 advantage, and global security concerns. The plaintiff did not have these concerns nor insights at
10 the time of submitting Bloodborg to Riot Forge in 2020. The IP infringement, the way the
11 plaintiff's complaint was mishandled and belittled and the prolonging of these proceedings, has
12 motivated the plaintiff's wider investigations into the running of Riot Games. The plaintiff
13 argues that, given the things he now knows about Riot Games and Tencent, he does not want his
14 work associated with Riot Games and its future and this rests on his conscience.

15 13f. Harm to British economy, gaming, literary and film industries- The Plaintiff
16 argues that, by subduing him, not paying for the use of his submitted IP content and by
17 redirecting the wealth gained off the back of his Intellectual property away from the UK, as the
18 Plaintiff is a British taxpaying subject, this constitutes theft from the crown and UK government
19 who would be in receipt of a portion of the wealth if it wasn't stolen and if the plaintiff was not
20 subjugated over and tread upon causing debilitating harm. As the Plaintiff had plans to breach
21 into many UK creative industries, including gaming, animation and film, this reckless disregard
22 for honesty, business integrity, rules and regulations has caused harm to the UK creative
23 industries.

24 13g. Given the reckless damage and inhumane disregard for vulnerable
25 competitors, rules and regulations and global cultures and health (This can be explained in an
26 article), as well as the workforce damage and reputational damage to the State of California, and
27 perhaps national security concerns and risks which Riot Games are causing, and likely to
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1 continue to cause on a global scale, the Plaintiff argues that he feels vulnerable and unsafe in
2 legal battles against this un reputable, hyper-aggressive, hyper-competitive and money fed,
3 powerful conglomerate, The State of California and UK government and governing bodies might
4 need to be involved in the process, safety and fairness of this case. Particularly in the litigation
5 discovery.

6
7 13h., Litigation Interventions- The Plaintiff argues that, given the history, pattern
8 of misconduct, the pattern of behaviours towards vulnerable competitors, the falsified timelines,
9 and the national security concerns, without strict overseeing interventions, such as making sure
10 Riot Games does not hide evidence or coercively control witnesses, it is impossible for him to
11 receive a fair and timely trial, and this has wider implications to further unfair competition,
12 reputational damage, global concerns and the Plaintiff's vulnerability in this case. There are
13 undisclosed barriers to legal representation and to the Plaintiff's concerns.

14
15 13i. Case progression- As this case progresses, the Plaintiff foresees several
16 authorities who may wish to be involved from the first hearing or may wish to enter the case
17 later. These involve but are not limited to: The California Civil Rights Department (CRD) who
18 have already been informed of this case, The California Attorney General's Office, The
19 California Department of Justice (DOJ), The UK Competition and Markets Authority (CMA),
20 The UK Information Commissioner's Office (ICO) and The British Embassy in the U.S.
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1 **14. Timelines which need litigation discovery.**

2 **Pre-Litigation Timeline:**

3
4
5 14a. Early 2020:

6 Initial Submission- M.W. Wolf submitted the manuscript BloodBorg: The
7 Harvest to Riot Games through the Riot Forge platform. The manuscript was also submitted to
8 the Curtis Brown Group, now owned by United Talent Agency, and selected others.

9 14b. November 2021:

10 Riot Games' Response- No formal response or investigation by Riot Games,
11 despite submission and claims of intellectual property infringement. The Plaintiff then received
12 discerning, and misleading emails and subsequently a letter from Aaron J. Moss of Greenberg
13 Glusker which the Plaintiff found to be threatening, dismissive despite the facts and misleading.
14 The Plaintiff can now show that this letter demonstrated a false timeline to mask their IP
15 infringement to the Plaintiff, their customers and the court.

16 14c. Over the Next 2 Years (Late 2021- 2024):

17 Attempts to Settle- The Plaintiff attempted several out-of-court negotiations,
18 including cease-and-desist requests and settlement offers, but these were ignored or disregarded
19 by Riot Games.

20 Health and well-being Impact notified- The Plaintiff informed Riot Games of his
21 suffering, disabilities and vulnerabilities as a person with PTSD, warning them of the health
22 impact that protracted litigation would have on his health and hardships. Riot Games continued
23 with their conduct, disregarding his warnings.

1 14d. Mid-2023:

2 Female Ukrainian Artist Case- The Plaintiff learned of Riot Games allegedly
3 bullying a young, vulnerable Ukrainian artist by claiming ownership of a common dictionary
4 word, "Arcane," in a copyright dispute, reinforcing their pattern of exploiting weaker parties. The
5 work of the vulnerable Ukrainian artist, in the middle of a war, was subsequently removed from
6 TeePublic following the copyright claim from Riot Games. This is particularly disturbing, as
7 they are involved in this copyright infringement case, which will show that Arcane is an
8 infringement, as well as the nature of the many other high-profile cases they have been involved
9 in.

10 14e. Ongoing:

11 Continued inaction and retaliation- Despite the Plaintiff's attempts to address the
12 IP infringement concerns, Riot Games continues to profit from Arcane and associated products
13 without investigating or addressing the Plaintiff's claims. Instead, they responded with threats of
14 legal fees, and threats to squash the Plaintiff's complaints from the very first hearing, further
15 compounding the Plaintiff's stress and mental health issues. Moreover, the whole of Riot
16 Games's lore and backstories have been altered to fit in line with the narratives and skills they
17 acquired from this IP infringement of Bloodborg: The Harvest by M.W. Wolf. Subsequently,
18 they found the key to their disjointed universes and fractured nonsensical narratives (Products)
19 and have been able to bring them all align because of this IP they copied from M.W. Wolf. Thus
20 every product they own, is tainted with the IP infringement of this case which is shaping up to be
21 long and definitive litigations for Riot Games.

22 14f. Cease and desist order or injunction: (now out of time)

23 Moreover, Arcane season 2 aired on Netflix in November 2024, preventing the
24 court from making a cease and desist order or injunction in time, further gaining profit, power
25 and reach of Riot Games and Tencent.
26
27
28

1 14g. No Response to Requests for Information:

2 Pre-litigation discovery attempts to aid the court and other requests and data
3 protection inquiries were either ignored or dismissed, showing disregard for transparency and
4 perhaps demonstrating damaging evidence being kept or destroyed.

5 14h. Wider damages to young civilians:

6 The Plaintiff had visions of investing in Youth Facilities in his local region,
7 getting children off the streets, away from drugs. This has not been possible because of the
8 hardships and stress caused in part by this case. Moreover, the addictive and hyper- competitive
9 nature of Riot Games's products, business model and behaviours demonstrate a damage to youth
10 culture, expectations and behaviours. The Plaintiff can show that Riot Games have misused their
11 position of power, money and influence over the youngest most vulnerable voice actors, asking
12 them to lie about timelines, which could be damaging to the development and careers of these
13 impressionable young people.

14 14i. Retaliations, Intimidation, pressure, harassment and threats:

15 Since opening these cases, the plaintiff has been conducting investigations and
16 appealing for further evidence, within his means and limited skill set. The plaintiff has been
17 harassed and frustrated by an influx of hate mail during this period. Since talking out about
18 Riot's theft, the plaintiff has had a bomb threat, been gaslighted, discriminated against, and I've
19 had his 5 year old daughter targeted with threats of sending AI child porn of her to her school
20 and to her mother. The plaintiff has been called crazy and a lunatic and many other things
21 targeting his disability and vulnerability as a veteran struggling with complex PTSD and
22 comorbid conditions. This isn't the actions of a safe company, and the plaintiff knows that it
23 wasn't all Riot and Fortiche, but this is the cultural climate they foster around them. If they
24 nurture this kind of toxic environment so evidently on the exterior, the plaintiff is concerned with
25 what innocent people on the interior had to, and indeed still might have to face daily.

1 14j. Creating toxic environments:

2 This is the toxic, violent and disturbing culture Riot Games fosters with its
3 retaliations, hateful and abusive mentality, its toxic and radicalising gaming environments, and
4 its anti-competitive culture of swiping, stealing and sabotaging others.

5 14k. Tax dodging:

6 The plaintiff is extremely concerned that Riot Games benefited from several tax
7 breaks from the French, Spanish and Canary Islands tax rebates. Tax breaks do not cover
8 fraudulent activity.

9 14L. Nonsexual grooming of children and young adults.

10 Mia Sinclair Jenness (Powder) states that she was cast when she was 10, in 2015
11 when Fortiche had 5 people working for them and there was no story nor funding, and she
12 performed the crying scene in 2016 or 17 before the show was written and before Melinda Dilger
13 had done the casting and before they got the greenlight. Mia was actually late to the casting, in
14 2021, she was 15, she was still a minor and asked or paid to lie. Even Linke's own unreliable
15 evidence shows all they had was a pitch which was scrapped. Moreover, Ella Purnell, Melinda
16 Dilger and other sources confirm that the show and the casting and the voices were all done
17 during lockdown in 2020 & 2021. Mia and Reed, the youngest, thus most vulnerable & easy to
18 manipulate cast members were both asked or paid to lie, and this is preying on the
19 impressionability of children, perhaps this even equates to nonsexual grooming. This follows the
20 pattern of behaviour at Riot of preying on the vulnerable.

21 Reed Shannon (Ekko) was also a young, up-and-coming impressionable young
22 man. In Arcane Afterglow: Act 3 Arcane Season 2 Aftershow, Reed says "Guys, personally,
23 when I signed on to do this, I was 16." This is, yet again, misdirection and building falsehoods
24 during Riot's summons to court for IP theft. Again, they target the youngest, thus most
25 vulnerable members to present their lies for them.

1 On 2 Dec 2021, Reed Shannon appeared on the Flickering Myth YouTube
2 podcast to talk about Arcane. At 1.45 minutes into the podcast Reed says, "I started working on
3 the show like three years ago." This too is false. But this date takes Reed back to Dec 2018
4 when Reed was 18 years old. But even this is lies, In Jan 2018, Linke sent a self-pitying video
5 message to Fortiche, to tell them that the show has been "delayed" for all further production of
6 the follow-up episodes of Arcane. At this point they were just playing about with the idea. In
7 other videos it is shown that it was "cancelled", not delayed. After Linke sent the video, Fortiche
8 had to "let the team go." In mid to end 2020, they started over again and had to "Be less shitty"
9 and Linke had to replace himself as the lead because he had no clue of what he was doing with
10 my manuscript, and yet he is given the title of Showrunner. Melinda Dilger was brought in to
11 babysit after May 2020 and she had to do everything, including the casting in mid to late 2020
12 and into 2021 during COVID. I can show much evidence that false timelines have been
13 presented, and Riot has leaned, or preyed, on the youngest and most vulnerable actors to present
14 lies. These actors were children at the time.

15 Mia Sinclair Jenness (Powder)- In Bridging the Rift, E2, Linke states that he
16 remembers going into the VO recording session, and thinking that today they are going to make
17 an 11- 12-year-old cry. He is talking about Mia Sinclair Jenness who was cast as Powder. This is
18 a deceitful misdirection to hide the crimes and IP theft. Mia was born 14 December 2005. She
19 could not have been 12 during video recording. In fact, she could be no less than 14 Years, 5
20 Months, 18 Days. In the snippets of her voice recordings, she looks a lot older than 14. Bios of
21 her at 16 still look younger than she was during recording. In fact, she was reported to have
22 joined the cast in the second week of October 2021. At the time of the CLUELESS podcast,
23 dated 25 Dec 2020, which Mia co-hosted, she had just turned 15 years old, and she looks
24 younger than she did when recording Arcane. Neither she, nor the interviewers and hosts, made
25 any reference to Arcane. The day before, on the CLUELESS podcast, 24 Dec 2020, Mia is
26 introduced as 15 and a Disney star. The host then lists her roles and Arcane is not on it. In the 31
27 Dec 2020 video, Mia states that she is not working and had very few opportunities. She took
28 many online classes to learn during this time of lockdown. She doesn't talk about Arcane. Thus,

1 we are already into 2021, and Mia hasn't performed her role, and she is 15 years old. Oh, and
2 then she confirmed that she got the job when she was 10 (which I don't believe is true).

3
4 Mia was 10 years old on the 14th of December 2015. Jinx was 2, Ekko was 6
5 months old, Fortiche was 5 people making 3-minute music videos, and nothing of Arcane
6 existed. The cast have been given NDAs to backdate lies and some express fearing Riot's
7 retaliations. Mia states in an interview that when she performed the crying scene, she was 11, she
8 had just turned 11 a few days before. This places recording of this scene in late December 2016,
9 years before the greenlight and years before it was all scrapped. Moreover, we know that the
10 material for the original pilots was not used because cast members and others have spoken about
11 it time and time again.

12 In fact, almost all Arcane was recorded and produced during lockdown
13 restrictions, of which were broken, post 2019. The show wasn't greenlighted until Mid-2020.
14 The mess they had before was either the scrapped Arcane material or made for the 10-year
15 anniversary announcement video, borrowed from other Riot cinematics, or swiped from the IP of
16 other companies.

17 The Plaintiff believes that Mia did have some involvement or discussions with
18 Riot in & Pre 2019, in the scrapped project, but rejoined in late 2021 under the revamp after
19 Arcane was greenlit, and under the casting of David Lyerly.

20 David states that he mentioned to Christian and Alex, "Hey, they worked really
21 hard with us, with the pilot for years, as we tried to sort of shape it into something that would get
22 greenlit and be allowed to move into production. As a thank you let's bring them in and let's find
23 roles for them in season one."

24 On the Travis Gafford's YouTube, David Lyerly confirms he joined Riot in 2017
25 and didn't even know about Arcane until the end of 2017. Thus, how was he in a booth with Mia
26 recording a crying scene, a year before he even knew about Arcane or worked for Riot and many
27 years before it was greenlit? David states that he did the first take but thought she could go
28 further, so they did it again and she nailed it, and he was crying and then when it was done, he

1 looked up and everyone in the room was crying. He states that's he saw Alex, Brad, Kathy and
2 the engineers, everyone was crying.

3 14m. Pressure to drop the case and highly inappropriate, Illegal and unethical
4 tactics of Riot's solicitors.

5 Tue 3 Dec, 23:07- Riot's solicitors refused to answer the electronic summons.
6 The Plaintiff understands that they can do this, yet they went further offering me legal advice
7 aimed at pressure and lies to persuade or coax The Plaintiff into dropping the cases and to
8 control his case. It's illegal for them to give The Plaintiff legal advice, and to tell him how to
9 interpret the law. It's illegal for them to tell The Plaintiff what an attorney would say, they are an
10 attorney, for the defendant, and they have said it, this is illegal. It equates to pressure to drop the
11 cases and manipulation of an adult in a much more vulnerable position than them, again showing
12 the culture of abuse of vulnerable people.

13 Moreover, in 2022 Riot tried to sue China-based developer Moonton Technology
14 for copyright infringement on IP they had blatantly swiped from other IPs. The courts and the
15 public have grown tired of Riots abusive ways and tossing dodgy money at everything and
16 everyone they abuse. Riot was unsuccessful... again. They used X comments and comments from
17 other social media platforms as their evidence. They showed just pictures of their characters
18 against the Moonton Technology characters and had none of the contextual evidence the Plaintiff
19 will be presenting with all the other avenues of evidence. The Plaintiff is using thousands of
20 pieces of evidence to show that not only have they used his trauma writing, but they also
21 engaged in many criminal behaviours.

22 It is highly inappropriate, Illegal and unethical for them to tell The Plaintiff what
23 to do and how to run the cases. It doesn't surprise the Plaintiff that they act like this as they
24 defend Riot and their actions, which we know are terrible to everyone. However, they have a
25 history of praying on people they see as weak, and this goes beyond individuals working for
26 Riot. It's so prevalent that its pathological, its embedded into the core of Riot Games's cultural
27 climate and behavioural expectations. Women, children, adults with disabilities and
28 vulnerabilities, Riot has targeted all of these perceived weaknesses or vulnerabilities. This points

1 at a very dangerous predatory organisation beyond saving. This is why The Plaintiff has asked
2 for Government and law enforcement to be involved in these cases.

1 **15. – Summery.**

2
3 *15a. Plaintiff Marc Wolstenholme (M.W. Wolf), a UK resident and the owner of*
4 *the copyrighted material of the M.W. Wolf catalogue of fiction, owns the exclusive copyright to*
5 *BloodBorg: The Harvest by M.W. Wolf created between [2018- 2019]. The Plaintiff asserts that*
6 *after submitting the Bloodborg manuscript to Riot Forge in 2020, The Showrunners of Arcane*
7 *misused this IP to save, secure funding, and to build the failing Arcane show and that this has*
8 *allowed Tencent, using Riot Games as a vessel, to gain an unfair advantage and expansion.*
9
10

11
12 *15b. Plaintiff Marc Wolstenholme, brings these actions under four cases, three*
13 *under the U.S. Copyright Act (17 U.S.C. § 501) and one under Intentional Infliction of Emotional*
14 *Distress (IIED): California Civil Code § 1708, against Defendant Riot Games, Inc., a*
15 *California-based video game development company owned by Chinese based Tencent.*
16

17
18 *15c. Plaintiff Marc Wolstenholme formally request the intervention of the State of*
19 *California and the UK government in these ongoing legal disputes with Riot Games from the*
20 *very first court hearing and the preparations for this hearing. As an individual facing intellectual*
21 *property infringement and corporate misconduct by Riot Games, the Plaintiff feels vulnerable in*
22 *this legal battle and is seeking assistance.*
23

24
25 *15d. In 2020, the Plaintiff submitted BloodBorg: The Harvest to Riot Games.*
26 *Since that time, the Plaintiff has made several attempts to negotiate or address the infringement*
27

1 of intellectual property, but Riot Games has repeatedly ignored these attempts and continued to
2 benefit financially from these infringements. This follows a long-standing pattern of misconduct
3 at Riot Games, including their \$100 million settlement for workplace discrimination, retaliation,
4 and ongoing reports of aggressive business practices.
5

6
7 15e. Areas of Concern- Unfair Competition: Riot Games' hyper-competitive and
8 predatory business practices are harming small competitors such as the Plaintiff (M.W. Wolf).
9 Their disregard for legal and ethical business standards is not only affecting the Plaintiff
10 personally but could also damage the broader marketplace and global industries. Riot Games,
11 headquartered in California, is contributing to the state negatively, damaging its reputation in
12 terms of corporate responsibility, with repeated legal issues and unethical practices. As Riot
13 Games is owned by Tencent, a company with ties to the Chinese government, their actions could
14 pose a risk to national security and data privacy, which is a concern for both the United States
15 and the UK
16
17

18 15f. as a small competitor, with dyslexia and psychological based disabilities, the
19 Plaintiff (M.W. Wolf) feels particularly vulnerable in this legal battle. Riot Games is an
20 enormously powerful corporation, and their threats of legal fees and disregard for the Plaintiff's
21 (M.W. Wolf) well-being have caused undue stress and emotional harm. The Plaintiff (M.W. Wolf)
22 is seeking fair treatment in this case but feels unsafe and overwhelmed.
23
24

25 15g. The Plaintiff respectfully requests that the State of California and UK
26 authorities consider intervening in this matter to ensure a fair and just resolution. The Plaintiff
27
28

1 believes that Riot Games' actions warrant greater scrutiny given the broader risks they pose
2 (G7).

3 15h. The Plaintiff would also ask that, given the hardships and other
4 disadvantages, lenient adjustments are made towards him, to prevent legal tactics and
5 gaslighting to strike out the claims before they have had chance to properly be investigated, and
6 the litigations discovery has had chance to take place to show true timelines and use of
7 unauthorised IP. This is a concern, given that this was a threat made by the attorney (Aaron J.
8 Moss) of Riot Games in the late November 2021 letter. Aaron J. Moss wrote, "Our law firm
9 regularly defends cases like yours and courts invariably dismiss them at the outset of the lawsuit.
10 We have no doubt that the same result would obtain were you to pursue your baseless claims."
11
12

13
14 Thank you for your consideration.

15
16 Yours Sincerely, *M. Wolstenholme.*
17

18
19 The Plaintiff, Marc Wolstenholme, M.W. Wolf.
20
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1 **16. Conclusion**

2

3 Riot Games has not responded to the summons and complaints, and their lack of

4 engagement in this legal process further exacerbates the harm caused. The Plaintiff alleges that

5 the Defendant has engaged in deceptive behaviors and bad conduct to try to aggravate the

6 Plaintiff and to have the cases dismissed as they have threatened to do so a number of times.

7

8 I Request that the Judge accept the PLAINTIFF’S OPPOSITION TO

9 DEFENDANT’S MOTION TO DISMISS PURSUANT TO FEDERAL RULE OF CIVIL

10 PROCEDURE 12(B)(6) AND MOTION FOR A MORE DEFINITE STATEMENT

11 PURSUANT TO RULE 12(E)

12

13 I counter request the court to enter a default judgment in the amount of £1.5

14 billion to reflect:

15

16 Direct and indirect financial harm.

17

18 Competitive market displacement.

19

20 Emotional and creative damages sustained as a result of the infringement.

21

22 I declare under penalty of perjury under the laws of the State of California that the

23 foregoing is true and correct.

24 Date: 11/01/2025

25 Signature: _____

26 Marc Wolstenholme

27

28

1 **17. Preliminary Evidence**

2
3 Federal Rule of Civil Procedure 8(a) outlines the general rules for pleading a claim for relief in
4 federal court. It establishes the basic requirements for a complaint, ensuring it provides enough
5 detail to give the defendant fair notice of the claim and the grounds upon which it rests. This is
6 not an exhaustive list of evidence. The Plaintiff will provide images, videos, submissions,
7 comparisons of his writing to Arcane, contextual evidence and medical records to show the
8 source of the trauma writing.
9
10

11
12 ***17a. 100 things alleged to have been stolen from Bloodborg to make Arcane.***

13
14 Please note, this is just a quick fire list of only 100 things out of thousands. Bloodborg has 6
15 interweaved POVs and a bunch of sub POVs. Thus when the Plaintiff says a character was taken
16 from his POVs, he means that Riot took the whole POV narrative and forced their cardboard
17 characters into his trauma writing. The Plaintiff asserts that this is why Arcane has essentially
18 retconned all of the characters, who already had different backstories, personalities and so on.
19 Some, like Viktor and Warwick, are so different that they are almost unrecognisable to the
20 originals. Indeed, both of these characters have now been made into Bloodborgs.
21
22

- 23
24 1. Vi was taken directly from Rook's POV.
25 2. Vander was taken from Warrick's POV.
26 3. Caitlyn Kiramman from Josh's POV.
27
28

1 4. Ambessa and Mel were taken from Neva and the white eyed child's POV.

2 5. Viktor was taken from D'borg's and D'anna's POV along with the higher consciousness and
3 the Archon.

4 6. Marcus is taken from Chris Redgrave's POV. His daughter Ren is taken from Chris's daughter
5 Ru (Ruby). As is Ishe as Ru-Bunny.

7
8 *Not from POVs but from Bloodborg.*

9
10 7. Finn is Katsuko

11 8. Huck is Marvin the Machine

12 9. Grayson is Dorothy Hall.

13 10. Loris is the QM, Bill Rewan

14 11. Chross and Silco's Henchman are taken from Raven Duke.

15 12. Smeech is inspired by a description of the naked mole rat.

16 13. In the first book, Singed is referred to as the science people or The techie science guys, and
17 he's working with the topside (Jayce and Viktor).

18 14. Shimmer is called Fetal Sapient Serum.

19 15. Deckard is taken from side characters called Dodge and Trex from the gangways.

20 16. The Firelights are called The Resistance.

21 17. Ekko's safe house hideout is called Lugar dal luz (Place of the light).

22 18. Butterfly drones are bee drones, Warwick's is called Biz.

23 19. Singed's look comes from Alcuin and his protective mask.

20. Jinx's psychotic PTSD and trauma response is taken from D'borg and a little from Warwick.
21. Salo losing use of his legs and self-medicating with the pink brush is taken from Chris Redgrave.
22. Jackie the dog and the Air-blade scene in Bloodborg is printed on a wall in Arcane.
23. Scuttle Butt and Stink Maw are taken from Crabbots.
24. The Enforcers are called the protection force.
25. Arcane's anomaly is called The Rupture.
26. The mutants and addicts in Arcane are called many names depending on their mutations and locations.
27. Benzo and his trading shop is Wu and Ling Zhang's trading shop in Bloodborg.
28. The cable cart in Arcane is the Sky-rail and Monorail in Bloodborg.
29. Viktor Jesus is called Sant'teon.
30. The Arcane is Gaia and higher consciousness.
31. The pit fight ring master is called Fat Pete in Bloodborg.
32. Hextech is fusion
33. The transformed Viktor is a Bloodborg. So is the final, transformed Warwick.
34. God / alien / Bloodborg Viktor uploading the consciousnesses of his followers, is called Deep Root and Vader in-brain.
35. Episode 2 begins with a mysterious figure who teleported Jayce, in Bloodborg the figure is called B. B is a disguised ancient cyborg sorcerer, she teleported Warwick away as he was about to die. She shows up mysteriously in times of crisis or near death.
36. The corruption we see in Jayce's alternative timeline is called bionic rot.

- 1 37. Finn's copper lighter is Morgan's copper lighter in Bloodborg.
- 2 38. Jinx's Tea party is taken from a Bloodborg chapter called Tea Party.
- 3 39. Oil and Water is taken from the Blood and Oil chapter of Bloodborg.
- 4 40. Bionic arm built out of whatever metal is around in Arcane is taken from the same in
- 5 Bloodborg.
- 6 41. Viktor's egg is D'Borg's Egg in Bloodborg.
- 7 42. Smeech's spin sword is taken from D'borg.
- 8 43. Singed's daughter in Arcane is Orianna, but she was the daughter of Dr. Reveck before,
- 9 Arcane made singed into both Singed and Dr. Reveck to take this storyline from Bloodborg's
- 10 Warick losing a child and trying to revive him in a robot /Cyborg.
- 11 44. Jayce's Rune in his arm is taken from D'borg, it's exactly the same device.
- 12 45. The green haired firelight is a resistance fighter with a glass mohawk with neon green veins,
- 13 in Bloodborg.
- 14 46. Vi's Pit fight in Arcane is Warwick's Pit fights in Bloodborg.
- 15 47. Vi's wrapped chest in Arcane is Rook's wrapped chest in Bloodborg.
- 16 48. Ekko's magic but corrupted tree is a corrupted magic baobab tree In Bloodborg.
- 17 49. Loris dies on a massive rail gun on top of a building, which is mentioned on top of the wall
- 18 in Bloodborg.
- 19 50. Simon's chemical rage is shown in Warwick.
- 20 51. Still Water Hold and VI in prison is taken from Chris's POV.
- 21 52. Of the two orphan friends, Claggor is called Mateo.
- 22 53. Mylo is called Macaulay.

1 54. Both Mylo and his Bloodborg counterpart, Macaulay, die from a pole impaled through their
2 bodies.

3 55. The trader's in the bar are called the Monroe Hunters.

4 56. Sevika is inspired by Chris's son Simon (who has bionic arms).

5 57. Silco and his goons are clearly Cowboy Momahan and his Feral Fighters.

6 58. Jinx's fan hideout is taken from Rook's under lanes.

7 59. The Lanes in Arcane are also called The lanes in Bloodborg

8 60. The Last Drop is taken from a code word of a food, alcohol and supplies stash location in
9 Bloodborg.
10

11 61. Eyes, such as changing eye colour with drugs, or transformations, are a feature of the story
12 telling in Bloodborg, and this has been lifted for Arcane.
13

14 62. Purple is an aesthetic storytelling future in Bloodborg, also used for Arcane.

15 63. The graffiti art and tagging is also a feature lifted from Bloodborg.

16 64. The device in Jayce's forearm is the same but in D'borg's forearm.

17 65. The opening scene on bridge between Piltover and the underbelly of Zaun is called the The
18 Great Bridge Dumping.
19

20 66. Vi & Jinx's dead parents scene is taken directly from Rook's nightmare of her parents being
21 murdered.
22

23 67. Benzo's trading shop is called Wu's Trading Shop in Bloodborg.

24 68. Arcane also copied Vi / Rook's opening Parkour scene and the characters behaviours.

25 69. The Blue Energy Balls from Arcane was also a concept of my Bloodborg Manuscript. The
26 turned the electromagnetic balls into their Hex Crystals.
27

1 70. That thing Silco shots in his eye to chemically control him is the same in Bloodborg, except
2 he inhales it orally.

3 71. The mushrooms painted around which you think was a clever idea of Riot Games, to
4 integrate whatever symbolism Mushrooms have to League of Legends... yeah that was taken
5 from my book.
6

7 72. Vi's age-stained mirror was also taken from Rook's POV.

8 73. The cable carts to Still Water hold are the monorails, and sky-rails in Bloodborg.

9 74. Vi eating slugs and bugs is also lifted from Rook.
10

11 75. Silco goes to the statue socratic conversation with himself. In Bloodborg, Josh does the same.

12 76. Cowboy Momahan is trying to unite the gangs for war in Bloodborg, which is what Slico is
13 doing in Arcane.

14 77. Piltover is the Assemblage

15 78. Zaun is called New Kowloon.
16

17 79. Ambessa losing a child in the Blood Sweat & Tears music video is taken from Neva.

18 80. The white eyed child from Blood Sweat & Tears music video grows up to be Mel. In
19 Bloodborg the baby was a boy, and he is called The white eyed child of great importance.

20 81. Jinx's Bionic Finger is Simon's of the same.

21 82. The teleporting Hax Gate is a function of D'borg's teleporting device, even looks like my
22 descriptions.
23

24 83. Viktor's coma is D'borg coma, and it was trauma writing of me in a coma.

25 84. The repeated cyclical themes of falling and drowning are the same I Bloodborg.
26
27
28

1 85. The three spiritual guardians in Blood Sweat & Tears are three spiritual guardians taking the
2 form as three hyenas in Neva's POV.

3 86. The cave in the shape of an eye is exactly the same.

4 87. Jinx with a Blue signal flare is what D'borg does to attract the mutant in Bloodborg.

5 88. The crab market of Slico's lair was originally a train station, as it is in Bloodborg.

6 89. Prostitutes of every creed and gender, every shade and size, touted for business in both and
7 we see the large breasted man standing outside in both.

8 90. Zander is stabbed in the belly and falls off the platform, which is the very same in
9 Bloodborg, but I happens to D'borg.

10 91. Ritual Dance Vultures dance from ther Blood Sweat & Tears music video is from Neva's
11 POV.

12 92. Vi's cut limp, swollen left cheek and maroon hand vail / Hood are the very same in Rook's
13 POV.

14 93. D'borg's psychotic brakes and drug regulation is directly stolen for Jinx.

15 94. In Bloodborg, Rook is a resilient and strong leader to her adoptive family, just as Vi is.

16 95. Jayce's personality and appearance change after he escapes "the anomaly," and he appears to
17 suffer from mental disturbance. This is stolen from Warwick's struggles of the same after he has
18 been transported away after "the Rupture" event.

19 96. In Bloodborg, a sniper called Josh suffers PTSD flashbacks of head shot kills, so does
20 Caitlyn.

21 97. Arrowhead Formation symbolism and foreshadowing in Bloodborg was lifted to build the
22 aesthetics and symbolism all though the Blood Sweat & Tears music video.

1 98. Infinity symbolism in Arcane is also taken from Bloodborg.

2 99. The base of the gateway around the wild Runes in Arcane known as The Wall or The Stand
3 in Bloodborg.

4 100. Viktor and Warwick are literally transformed into Bloodborgs near the end of Season 2.
5
6
7

8 ***17b. Psychosis and mental illness as trauma responses in Bloodborg and Arcane characters-***
9 ***matched.***
10
11

12 1, D'borg's psychotic brakes and drug regulation is directly stolen for Jinx. After the tragic
13 events in her childhood, Jinx experiences hallucinations, paranoia, and dissociation. Her erratic
14 behaviours and violent tendencies are closely entwined to her unresolved guilt and loss.
15

16 2, In Bloodborg, Rook is a resilient and strong leader to her adoptive family, just as Vi is. Yet
17 her actions lead to her two adoptive brothers being killed, one with a pole impaled through his
18 body, exactly the same as Jinx's actions lead to the death of her two brothers. Mylo was impaled
19 through his body. Rook has to deal with this trauma and aggression and survivor's guilt. While
20 Vi is resilient, she has to deal with intense trauma, survivor's guilt, and post-traumatic stress. Her
21 anger and impulsivity often surface as coping mechanisms. In Vi we see the same coping
22 strategies as Warwick In Bloodborg. Those being Pit fights, isolation, alcohol abuse, existential
23 nihilism and self-neglect.
24
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1 3, Jayce's personality and appearance change after he escapes “the anomaly,” and he appears to
2 suffer from mental disturbance. This is stolen from Warwick’s struggles of the same after he has
3 been transported away after “the Rupture” event. - Same, same!
4

5
6
7 4, In Bloodborg, a sniper called Josh suffers PTSD flashbacks of head shot kills. It’s all too much
8 for Josh, he is soon sick of the killing and the mayhem of war, he has to go AWOL because he
9 can’t take much more. In Arcane, this is directly lifted for Caitlyn Kiramman who suffers
10 flashbacks in season 2. Caitlyn experiences significant stress and moral dilemmas, showing signs
11 of burnout from her role as an enforcer.
12

13
14 5, In Bloodborg, Cowboy Momahan, the leader of the Feral Fighters, has vowed to unite the
15 gangs, the hunters and raiders of The Needles district, to fight against other districts, for full
16 control of New Kowloon. He has announced that he will be the first King of New Kowloon. He
17 is a Narcissistic violent and cruel scrawny rat of a man, barely kept in check with inhaled
18 neurotransmitter drugs. In Arcane Silco demonstrates signs of narcissism and paranoia. His
19 obsession with power and control, along with his delusions of grandeur, reflect deep
20 psychological scars from betrayal and loss. He self regulates in the same way, yet he injects the
21 drug into his eyeball. Silco is a subtle and more poised, dialled down version of Cowboy
22 Momahan.
23
24
25
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28

1 6, Viktor's declining health and obsession with Hextech lead to signs of depression, existential
2 dread, and obsession. His isolation and desperation reflect the psychological toll of his condition.
3 This is taken from Simon's conditions, as well as his father Chris Redgrave's conditions and
4 psychological state. I also wrote elements of a desire to be something better and to have an
5 unbroken body into Roy the Robot's psychological state. Roy suffers from body dysmorphia and
6 desires a transformation, just as we see in Viktor.
7

8 7, Ambessa Medarda is devoid of sentimentality, which could suggest a form of emotional
9 detachment or desensitization developed through tragic loss, years of hardship and violence. Her
10 character embodies traits of emotional repression, ruthlessness, and a survivalist mindset. This
11 psychological state is taken from Neva, an African tribal leader who lost a child, which is my
12 direct trauma writing of the tragic loss of my niece.
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18. Exhibits supporting OPPOSITION TO DEFENDANT’S MOTION TO DISMISS

Exhibit A- Journal Technologies Court Portal, evidence of filed documents and pending documents. Pages 1 & 2

Account

My EFSP Filings

My Reservations

My Filings

Payment Profile

Q Search

g documents.

Pages 1 & 2


Filing Date	Case Number	Court Transaction Id	Filing Title	Type	Matter Number	Status
2025-01-09	245TCV28643	25LA00051667	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Accepted
2025-01-08	245TCV28643	25LA00039644	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Partially Accepted
2025-01-07	245TCV28643	25LA00038413	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Submitted to Court
2025-01-04	245TCV28643	25LA00018511	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Rejected The document does not comply with CRC 2.111 format for the first page. Missing document title. Contact info is different from the complaint and lacks a phone number. Ensure it has a valid mailing address.
2025-01-01	245TCV28643	25LA00000214	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Rejected Incorrect case category and/or case type selected. DOES NOT COMPLY WITH CRC 2.111
2024-12-07	245TCV28643	24LA02087230	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Accepted
2024-11-05	245TCV28643	24LA01892142	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Accepted
2024-11-01	245TCV28643	24LA01874908	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Rejected Please remove signature: It is meant for the clerk's stamp (unable to apply stamp) Please remove date: for court use.
2024-11-01	245TCV28643	24LA01870916	MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Subsequent	M.W. Wolf's 4 cases vs Riot	Rejected Summons must conform exactly word for word Case number missing
2024-10-31	245TCV28643	24LA01868117	M.W. Wolf's 4 cases vs Riot	Case Initiation	M.W. Wolf's 4 cases vs Riot	Partially Accepted

1

2

next

Results Per Page

Journal Technologies Court Portal

HomeMy Accounte-FilingMy Previous FilingsCourt ReservationsContact Us

marc WolstenholmeLogout

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Q Search

Filing Date	Case Number	Court Transaction Id	Filing Title	Type	Matter Number	Status
2024-10-31		24LA01861904	M.W. Wolf's 4 cases vs Riot	Case Initiation	M.W. Wolf's 4 cases vs Riot	<div>Rejected</div> <div>Unable to file complaint. Per the First Amended General Order Regarding Mandatory Electronic Filing for Civil, electronic documents must be electronically filed in PDF, text searchable format. Missing The Civil Case Cover sheet (CM-010)</div>
2024-10-30		24LA01858447	M.W. Wolf's 4 cases vs Riot	Case Initiation	M.W. Wolf's 4 cases vs Riot	<div>Rejected</div> <div>This complaint and the summons need to be submit it, in improper format, and missing pages.1 and 2 for the civil cover sheet . Please correct and resubmit.</div>
2024-10-30		24LA01854316	M.W. Wolf's 4 cases vs Riot	Case Initiation	M.W. Wolf's 4 cases vs Riot	<div>Rejected</div> <div>Unable to file the Complaint without the required mandatory form "Civil Case Coversheet Addendum and Statement of Location", Local Form LACIV 109 revised January 2023.</div>

previous

12

[MARC WOLSTENHOLME]

Complaint accepted - marc@mwolf-fiction.co.uk - Marc Wolstenholme Mail

in:sent

Case No. 24STCV28643- Amended Complaint accepted External Inbox x

Marc Wolstenholme <marc@mwolf-fiction.co.uk>
to Joshua, Aaron, dan.chang, andrew.gardner, contact, Copyright

Fri 10 Jan, 17:58 (6 hours ago)

Dear Josh,

Thank you for the pleasant conference call yesterday.

It's ashamed that Riot Games are unwilling to cooperate to come to out of court settlements. I'm pleased that you're a pleasant and respectable man, it seems like these four cases are going to be lengthy.

As discussed, we are working from two different case and case numbers. I have not received any official motions or notices from you nor the federal court nor the district court. Thus, I will continue with the cases I opened until the court or judge instructs me to do otherwise. Or until I can access the notions you state that you have served in the federal court docket. Please note, the April Case management hearing is still live, and I plan to attend that hearing in person or remotely.

Please note, I'm from the UK, I have dyslexia and vulnerabilities due to Complex PTSD, and I have much to learn about the US court systems. The switching of cases seems like legal movements to try to get the case kicked out on technicalities. Forgive me for not trusting you. I'm sure we can clear up the confusion in due course.

As you know, I have opened four cases, as of yet. These cases are:

- (1) COPYRIGHT INFRINGEMENT (17 U.S.C. § 501)
- (2) VICARIOUS COPYRIGHT INFRINGEMENT (17 U.S.C. § 501)
- (3) UNFAIR COMPETITION (17 U.S.C. § 501)
- (4) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED): CALIFORNIA CIVIL CODE § 1708.

It would have been simpler to keep all the cases together. If, as you say, the district court cannot hear copyright cases, federal courts can hear state law claims under 28 U.S.C. § 1367 if they arise from the same facts as the copyright claims. Thus, I am not against moving to federal court so long as I am not disadvantaged by this, and the proper legal channels are used, and I can access the dockets and cases on the PACER or Journal Technologies Court Portal (Which I am currently using).

Please see attached:

1. Amended Complaint accepted by the court.
2. NOTICE OF CONFIRMATION- Amended Complaint.

These have been electronically filed and accepted via the Journal Technologies Court Portal.

I'm popping out to walk the dog and give my brother a lift, then later I'll try to ring the district court again, and the federal court, for clarity into these matters.

Many Thanks,

Marc Wolstenholme

Gmail - Complaint - Short Form filed- 24STCV28643 - marc@mwolf-fiction.co.uk - Marc Wolstenholme Mail

Compose

Mail

Inbox

Starred

Snoozed

Sent

Drafts

More

Labels

- CBG Court claims
- Hate Mail
- M.W. Wolf Company & a...
- Riot Games

Search: jgeller@greenbergglusker.com

Complaint - Short Form filed- 24STCV28643 External Inbox x

Marc Wolstenholme <marc@mwolf-fiction.co.uk>
to Joshua

Wed 1 Jan, 20:17 (10 days ago)

Your Order Number: EF-8bb60c13f989

Court Transaction ID: 25LA00000214

Order

County/Location: M.W. Wolf's 4 cases vs Riot 01/01/2025 12:15pm	Central District Stanley Mosk Courthouse Department 20	Submitted Date:	Matter #:
---	--	-----------------	-----------

Case

Filing Title: Civil Unlimited Other Breach of Contract/Warranty (not fraud or negligence) 24STCV28643 MARC WOLSTENHOLME vs RIOT GAMES, INC., et al.	Case Category: Case Number: Case Name:	Case Type:
---	--	------------

Documents

Complaint - Short Form	complaint-against-riot-games-pdf.pdf - 12419826kb
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Additional Documents

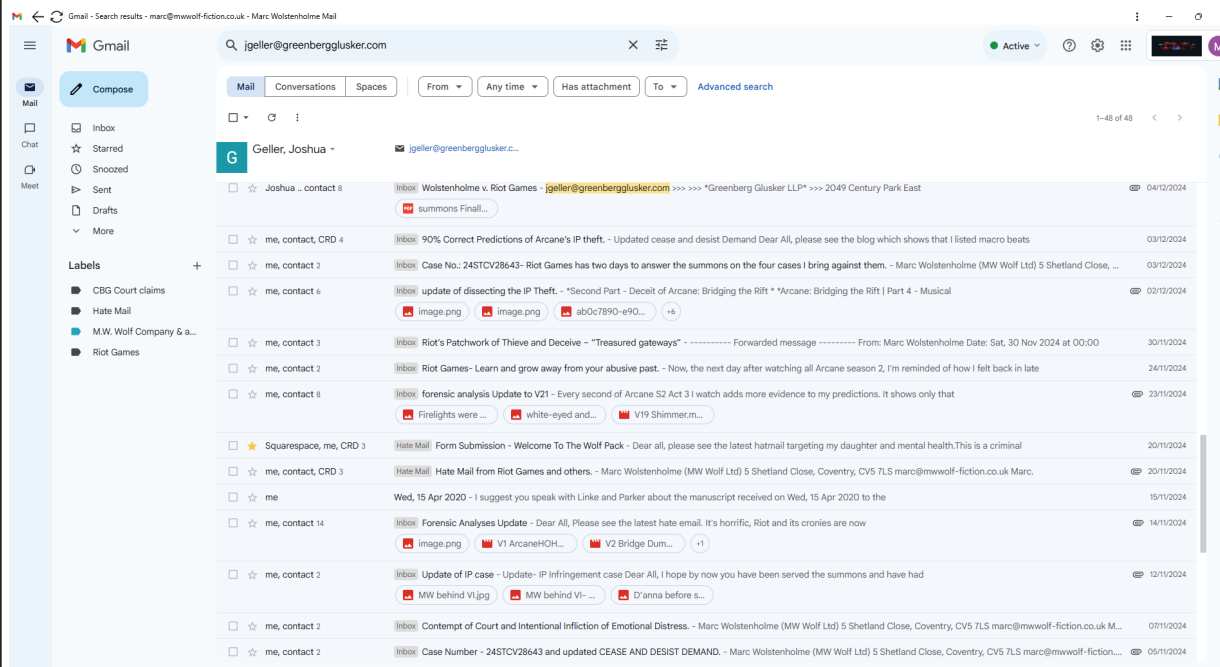
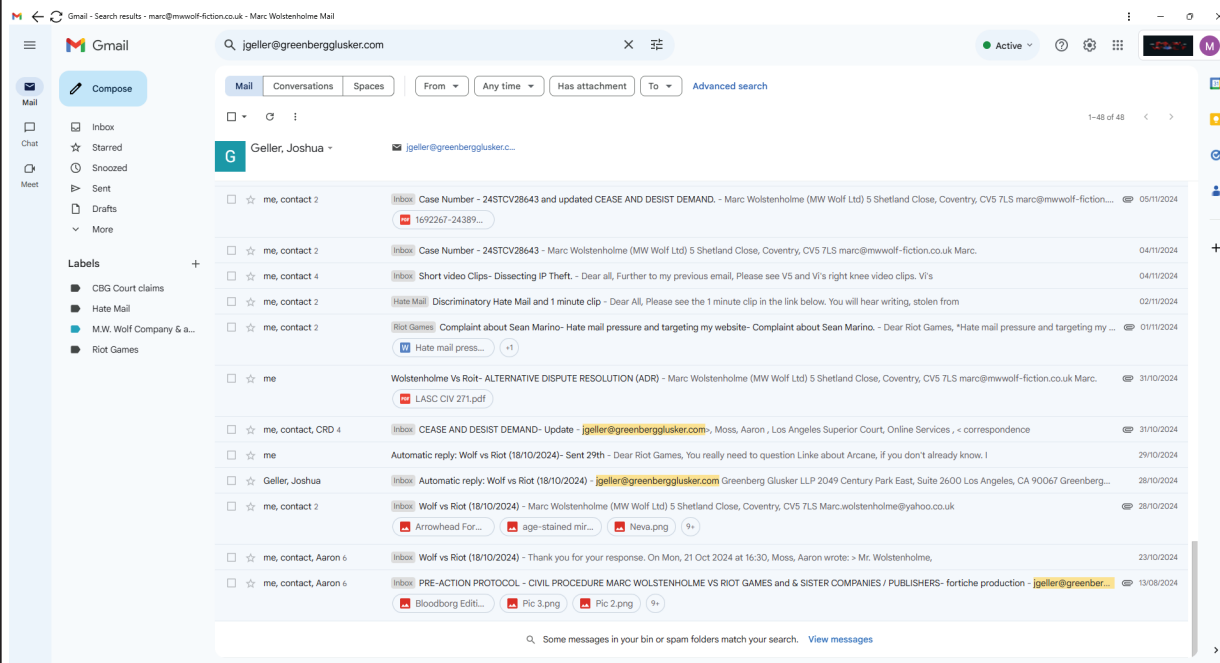
Marc Wolstenholme <marc@mwolf-fiction.co.uk>
to Aaron, dan.chang, hsmmedia, Copyright, cia_folia, Joshua, bcc: andrew.gardner, bcc: contact, bcc: bogdan.postolache

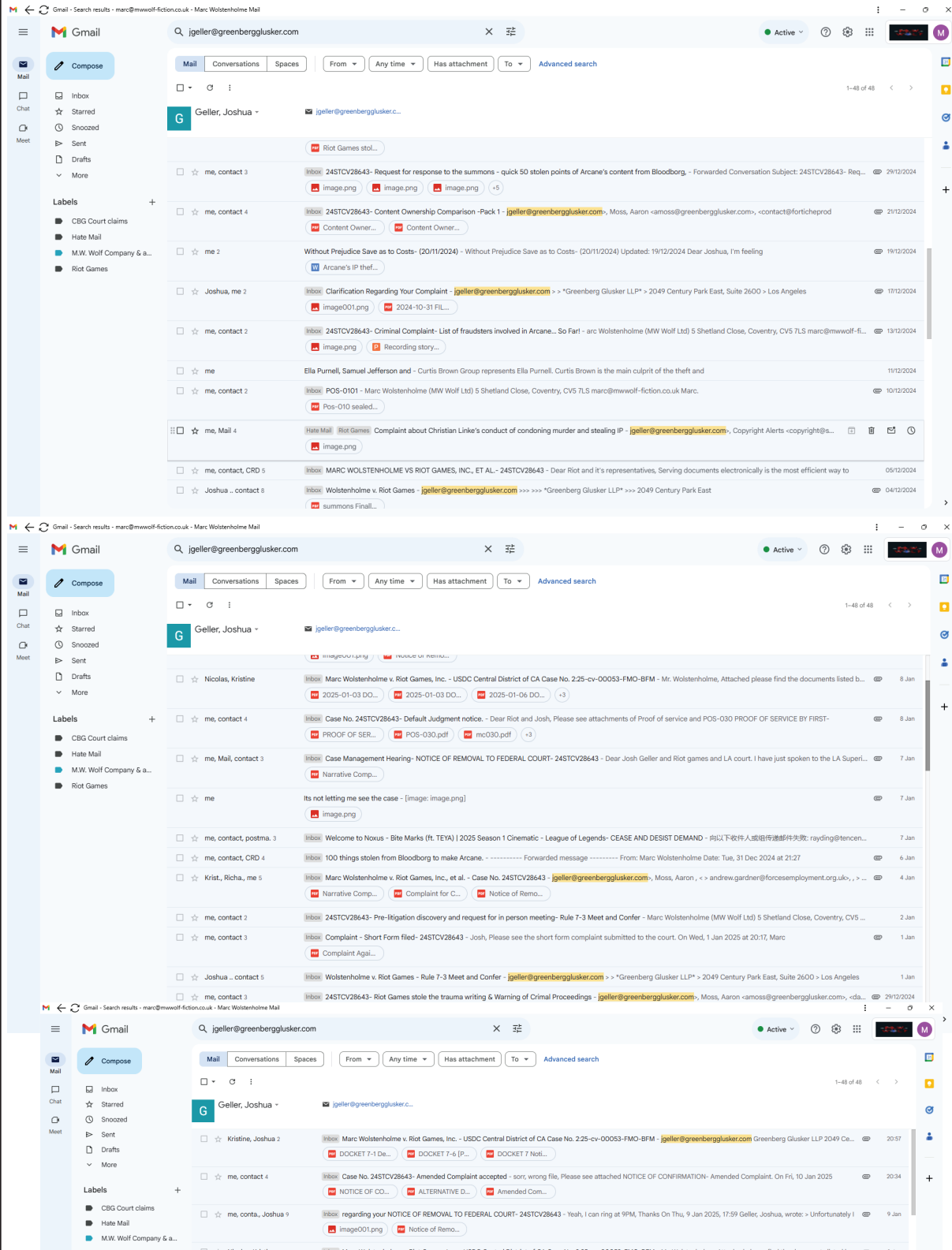
Josh,

Please see the short form complaint submitted to the court.

One attachment - Scanned by Gmail

Exhibit C- Attempts of prelitigation decisions.





1 **Exhibit D- Pre-litigation discovery attempts and request for in-person meeting, ignored.**

2
3 **24STCV28643- Pre-litigation discovery and**
4 **request for in person meeting- Rule 7-3 Meet and Confer**

5 **External**

6 **Inbox**

7 Search for all messages with label Inbox

8 Remove label Inbox from this conversation

9 **M**

10 **Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

Thu 2 Jan,
15:43 (9
days ago)

11 to Joshua, dan.chang, Aaron, andrew.gardner, contact, Copyright, cia_foia, hsimedia

12
13 Marc Wolstenholme (M.W. Wolf Ltd)
14 5 Shetland Close, Coventry, CV5 7LS
15 Marc.wolstenholme@yahoo.co.uk
07827964404

16
17 Marc Wolstenholme (M.W. Wolf LTD).
18 Plaintiff

19 v.

20 Riot Games, Inc.
21 Defendant

22
23 Dear Josh,

24 As part of pre litigation discovery could you please provide me with the following
25 information during our in person Meet and Confer. I request that Riot Games organise
26 and pay for my trip to LA to accommodate this.

- 1 1. A timeline of development of Arcane
- 2 2. A timeline of development of the Blood Sweat & Tears ft. Sheryl Lee Ralph Official Music Video.
- 3 3. A full list of Riot Forge submissions including my submission of Bloodborg (April 2020).
- 4 4. A record of all email addresses and computers (Meta Data) of who had access to these files and who they were shared with.
- 5 5. A full list of every person who worked on Arcane including actors, agents, casting directors, employees of Riot Games, Fortiche Production SAS, Netflix, Tencent Games and any other companies.
- 6 6. Please provide dates, timelines and job roles for all who were involved.
- 7 7. A full list of people, companies they represented and minutes of meetings for all Arcane related meetings, including the board meetings which decided to greenlight the show.
- 8 8. Please provide a comprehensive breakdown of spending on the show including tax breaks, pay statements, and all receipts and transactions.
- 9 9. Please data mine the servers of Riot Games, Fortiche Production SAS, Netflix, and Tencent Games for all Arcane and Blood Sweat & Tears related content.
- 10 10. Please provide all of the correspondence of Christian Linke, Alex Yee, Rowan Parker who was the Creative Director at Riot Forge, Nicolo Laurent and all others involved in Arcane's development.
- 11 11. Please provide times and dates of which I can gain access to all of Riot Games servers, and those of Fortiche Production SAS.
- 12 12. Please construct a timeline of interviews for me to conduct interviews with all of Riot Games's employees and the same for Fortiche Production SAS.
- 13 13. Please provide all of the Bloodborg content which was pinned to writing rooms in Riot Game's HQ in LA and also pinned to the storyboard rooms at Fortiche Production SAS.
- 14 14. Please provide a list of cast members under 18 and their parental consent forms.
- 15 15. Please provide all Arcane related NDAs signed and dated.
- 16 16. Please schedule a meeting for me to discuss these matters with all animators and storyboard collaborators at Fortiche Production SAS.
- 17 17. Please draft up an anonymous questionnaire to be agreed upon, to be circulated and answered by all employees at Riot Games, Fortiche Production SAS and all other companies involved in the production and development for Arcane.
- 18 18. Please provide an official response to the Summons sealed by the court on 11/05/2024.
- 19 19. Please provide me with a complaint response regarding Christian Linke's conduct of condoning murder on X and stealing IP. Linke wrote "IONO ABOUT YOU ALL BUT I THINK IT'S TIME TO LET FORTICHE BRING BACK... THE FRENCH GUILLOTINE."
- 20 20. Please provide me with an update and all information into Riot's investigations into the hate mail I have received from Rioters, people at Fortiche and the wider toxic and radical community and cultural climate Riot fosters.

1
2 Thank you very much,

3 I look forward to your response for an in person meeting. I hope that you can provide
4 this information at the Meet and Confer.

5 I will again state that I am willing to come to early out of court settlements with Riot
6 Games. I might even plug all of the holes in their lores and products if they stop abusing
7 my trauma writing.

8 I will again ask that we hold off any advancements with the court until after the 9th to
9 give me a bit of breathing room. Again I state, the cases in the UK which I will be
10 attending on the 7th and 8th of January are very taxing on me and are both directly
11 related to trauma.

12 Please hold off until after then.

13 Many thanks,

14 Marc Wolstenholme
15
16
17
18
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23
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28

Exhibit E- evidence of submissions of Bloodborg

Fw: Marc Wolstenholme/ Bloodborg: The Harvest/ Will Francis

External

Inbox

Marc Wolstenholme <marc.wolstenholme@yahoo.co.uk>

Attachments

Thu, 28 Nov 2024, 20:34

to me

----- Forwarded message -----

From: Marc Wolstenholme <marc.wolstenholme@yahoo.co.uk>

To: submissions@janklow.co.uk <submissions@janklow.co.uk>

Sent: Wednesday 15 April 2020 at 22:43:23 BST

Subject: Marc Wolstenholme/ Bloodborg: The Harvest/ Will Francis

From: Marc Wolstenholme, 07827964404, marc.wolstenholme@yahoo.co.uk

Book: Bloodborg: The Harvest, Cyberpunk/ Fantasy Trilogy.

Word count: 95,000

1 To Will Francis at Janklow & Nesbit- 15/04/2020

2
3 Dear Will,

4
5
6 Bloodborg: The Harvest, is the first book of a Cyberpunk/ fantasy trilogy with a
7 complex parallel story structure of six intersecting POVs and a backstory. The stories can each
8 standalone but are also woven into each other to built conflict and tension; matching lulls with
9 high points and inciting events with rug-pulling moments while watching the evolution of our
10 protagonists as they each confront their battles. Time is an element of the storytelling, having a
11 timeline that reaches backwards from the future present to different times in the future past, then
12 back to Coventry in the Old-World (2025).

13
14
15 The book traverses the World; New Kowloon (Manhattan), Dunkirk, Zimbabwe,
16 Coventry, Las Vegas and the river Wye. Human Diversity and the way we treat each other is also
17 a central theme.

18
19
20 The world (Mother Gaia) is dying because of human activity and war. Biological
21 weapons have been released around the world as part of the Ark's depopulation plan. The people
22 of The Ark of Civilization (Britain) and the Assemblage (USA) built gigantic defensive walls to
23 keep out the Nullifidian, which is a term used to dehumanize the none chosen so that the Ark
24 Defence will commit genocide, to save humanity.

1 Blood is the most valued commodity in the world; Pregnant women are worth the
2 most, chiefly women in the first eight weeks of pregnancy because the embryo produces
3 trophoblasts, which is in high demand, to produce Fetal Sapien Serum which rejuvenates the
4 consumer and extends their life expectancy. People are hunted for blood markers. The Founding
5 Families have made the people of the Ark believe Gaia is dying to perpetuate war, a distraction
6 while they harvest enough blood variance to create the perfect Bloodborg.
7

8
9 The Founding Families are gearing towards a world without resistance, a one-
10 world slave machine where the survivors see them as gods. They plan to re-house their minds in
11 Bloodborgs, the pinnacle of all creation, the ultimate cybernetic human beings; Merging AI, In-
12 brain computers, robotics and synthetic human self-regenerating tissue with the perfect cocktail
13 of endless blood to be immune to all diseases and ageing.
14

15
16 Our protagonists are all being radicalized in different and complex ways by B, an
17 ancient Cyborg, thought to be dead who is working with Teki Nagasaki, the ancient hacker who
18 created Deep-root which is an In-brain computer network. Teki and B are leading a fight back
19 against the Founding Families, but this is very implicit in this book. In This book, our
20 protagonists begin their journeys.
21
22

23
24 I'm a college lecturer of Public Services and Sports. I have lived a life of struggle
25 and strife. Growing up with severe dyslexia was difficult. I left my family home at the tender age
26 of 14 because of violence. At 16, I joined the British Army. At 17, I was in a coma after an RTA
27

1 in Germany, I struggled on, serving our country with injury and mental illness until I was
2 medically discharged in 2011. I continued to suffer with PTSD, depression, anxiety and sleep
3 disorders until gaining more help and diagnosis of my struggles in 2017.
4

5
6 It isn't all pain and darkness. I also experienced post-traumatic growth. I
7 completed a degree in Sports and education. I mentored young struggling teenagers, paid and
8 voluntary. I have maintained professional employment in different educational settings. I
9 travelled much of the world. Most recently, I became a father to the loveliest little girl I have
10 ever seen, Lily Angela Wolstenholme.
11

12
13 In August 2014, alone in the dark, after just experiencing sleep paralysis (a
14 disorder I am well acquainted with), I wrestled Insomnia for a while but soon submitted. I turned
15 on my laptop and began to research mental illness and its treatment. This led to me writing my
16 first book; After the Black: Buried at Bedlam. This book has not yet been published. It's had a
17 consultancy editorial report; it needs a lot of editing, which I will get around to doing.
18

19
20 Writing became an outlet for me, a release and a passion. I wish to become a
21 successful novel writer. I believe the Bloodborg trilogy will be my first step in this direction. I
22 have an awful lot of stored stories, longing to be written.
23

24
25 I hope you enjoy reading Bloodborg: The Harvest.
26

I plan to submit to selected agents. Thank you for your time and consideration. I look forward to hearing from you.

Warm wishes,

Marc Wolstenholme

3 attachments

• Scanned by Gmail

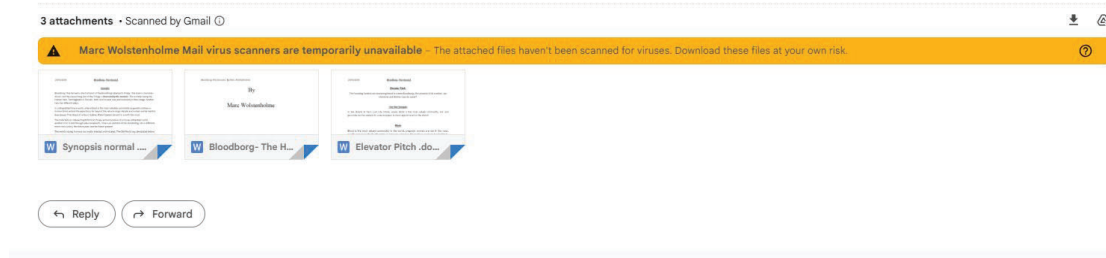


Exhibit F- Evidence of the Defendant conspiring to take advantage of Plaintiff's vulnerabilities and of Defendant planning unethical legal technicalities to evade lawful outcomes.

F1, 2021 Letter threatening to have the case kicked out.

Our law firm regularly defends cases like yours and courts invariably dismiss them at the outset of the lawsuit. We have no doubt that the same result would obtain were you to pursue your baseless claims.



Aaron J. Moss

D: 310.785.6814

F: 310.201.2314

AMoss@ggfirm.com

File Number: 74677-00001

November 28, 2021

Via E-Mail

Marc Wolstenholme
Inkberrow, Worcestershire, WR7 4EF,
England
Marc.wolstenholme@yahoo.co.uk

Re: *Cease and Desist*

Dear Mr. Wolstenholme:

This law firm represents Riot Games, Inc. ("Riot"). I am writing in response to the various allegations you have made concerning the television series *Arcane*, including as set forth in your various letters to Riot representatives dated November 26, 27 and 28, 2021. As explained in detail below, your claim that Riot infringed the copyright in your unpublished manuscript entitled "Bloodborg: the Harvest" (the "Manuscript") is both legally and factually baseless.

1 Your emails appear to suggest that you hired a literary agent whom, without your
2 permission, gave or sold the Manuscript to Riot. This is simply false. Riot did not purchase or
3 acquire your Manuscript to create *Arcane*. Rather, the program was developed in-house by Riot
4 and its employees over a period of many years. The show is not based on any acquired property;
5 to the contrary, and as you know, the show is based on underlying Riot IP from *League of*
6 *Legends*, and much of the characters, settings, plots and other copyrightable elements of Riot's
7 property were first created more than a decade ago.

8 To be clear, neither Riot nor the individuals who helped create *Arcane* ever received a
9 copy of your Manuscript. Nor does your work appear to be publicly available. If you would like
10 to send a copy of your Manuscript to my attention, you are certainly welcome to do so—but
11 please understand that there is absolutely no truth to your suggestion that your manuscript made
12 its way into Riot's hands. In the absence of evidence that Riot had any access to your work, you
13 cannot state a copyright claim as a matter of law.

14 While we do not have a copy of your manuscript that would allow us to fully evaluate
15 your claims, it is abundantly clear that there is no possible claim for copyright infringement
16 based on the so-called "similarities" you have identified in your correspondence. Whether or not
17 you truly believe that your work has been copied (which is, emphatically, not the case), you
18 appear to be operating under a fundamental misunderstanding of United States copyright law.

19 In order to establish a claim of copyright infringement under the U.S. Copyright Act, a
20 plaintiff must show that two works are "substantially similar" in creative expression (as opposed
21 to simply ideas) based on both an extrinsic and an intrinsic test. *Funky Films, Inc. v. Time*

22 1900 Avenue of the Stars, 21st Floor, Los Angeles, CA 90067
23 MAIN 310.553.3610 FAX 310.553.0687 GreenbergGlusker.com
24 74677-00001/4198185.2

Marc Wolstenholme
November 28, 2021
Page 2

Warner Ent. Co., L.P., 462 F.3d 1072, 1081 (9th Cir. 2006). The extrinsic test in particular looks only at the *copyrightable elements* of the works. *Id.* at 1077 (courts must “filter out and disregard” the non-protectible elements when comparing two works).

Copyright does not protect abstract or general ideas; rather it protects only the concrete expression of those ideas. *Cavalier v. Random House, Inc.*, 297 F.3d 815, 823 (9th Cir. 2002). This means that copyright law does not protect basic plot premises or features of the work that flow directly from those ideas. *Id.* (“Scenes-a-faire, or situations and incidents that flow necessarily or naturally from a basic plot premise, cannot sustain a finding of infringement.”). Generic concepts—like a story featuring orphans, or a story with cyborgs and mutants—are not protectible and therefore cannot form the basis for a claim of copyright infringement.

The supposed comparisons you cite in your correspondence are exactly the sort of things that copyright law does *not* protect. You cite stock concepts like the fact that *Arcane* follows a group of orphans, and that there is a “stocky and rough leadership figure who helps children and is revered as a hero.” Those are merely ideas that are simply not protected by United States copyright law.

This fact does not change even when you list dozens of purported “similarities.”¹ Under applicable law, lists of similarities are “inherently subjective and unreliable,” and federal courts will not rely on such lists of “random similarities scattered throughout the works” to find substantial similarity. *Litchfield v. Spielberg*, 736 F.2d 1352, 1356 (9th Cir. 1984). For that reason, United States courts *routinely* dismiss copyright infringement claims based on allegations of similarity far more extensive than those you have identified. *E.g.*, *Shame on You Productions, Inc. v. Elizabeth Banks*, 120 F. Supp. 3d 1123 (C.D. Cal. 2015); *Wild v. NBC Universal, Inc.*, 788 F. Supp. 2d 1083 (C.D. Cal. 2011); *Zella v. E.W. Scripts, Co.*, 529 F. Supp. 2d 1124 (C.D. Cal. 2007).

In your letter, you incorrectly assert that you would be entitled to statutory damages or attorney’s fees if you were to sue Riot for copyright infringement. Not so. Your Manuscript does not appear to have been registered with the United States Copyright Office, and statutory damages and attorney’s fees are therefore unavailable. 17 U.S.C. § 412 (no award of statutory damages or of attorney’s fees shall be made for any infringement of copyright in an unpublished work commenced before the effective date of its registration).

¹ Please note that the “similarities” you cite are not similar in the first place. Even trivial comparisons are grossly misrepresented in your attachments—your comparisons between a “maroon veil” (sic) and Vi’s hood, or a bar called “The Last Drop” and your use of this ordinary phrase in an entirely different context (referring to the last bit of some food) simply underscore your allegations’ lack of viability. “Ordinary words and phrases are not entitled to copyright protection, nor are ‘phrases or expressions conveying an idea typically expressed in a limited number of stereotyped fashions.’” *Bernal v. Paradigm Talent & Literary Agency*, 788 F. Supp. 2d 1043, 1071 (C.D. Cal. 2010).

Marc Wolstenholme
November 28, 2021
Page 3

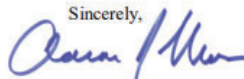
It is instead *Riot* that would be able to recover any attorney's fees it is required to expend defending any of your frivolous claims. Please understand that this means that if you pursue legal action against *Riot* you will be exposing yourself to substantial monetary liability. *Riot* will not hesitate to pursue all available legal remedies in connection with your allegations.

Our law firm regularly defends cases like yours and courts invariably dismiss them at the outset of the lawsuit. We have no doubt that the same result would obtain were you to pursue your baseless claims.

I note that you have stated in your correspondence that you do not want the stress of having to fight for years over your supposed copyright claims. Because your allegations of infringement are entirely misguided and based on a serious misunderstanding of copyright law, I urge you to follow your own advice and not waste any more of your energy pursuing these meritless allegations. Your requests for a face-to-face meeting with *Riot*'s executives and for compensation are rejected in full.

Because this firm is now representing *Riot* in this matter, we also demand that you refrain from contacting *Riot*'s employees and executives any further. Should you wish to respond to this letter, you are directed to respond to my attention alone.

This letter is not a full and complete recitation of *Riot*'s rights and remedies, all of which are expressly reserved.

Sincerely,

Aaron J. Moss

cc: Joshua Geller, Esq.

74677-00001/4198185.2

F2, Notions incorrectly served.

The Plaintiff attempted many different methods and approaches to out-of-court and early settlements and discussions. Every attempt was met with perceived bullying threats to cause further harm and financial hardship, and perceived bullying attempts to convolute the legal process and to build technicality traps. The Plaintiff's many attempts a discourse were met with diversions such as "We've received your emails and will respond through the appropriate legal channels." However, even after being served, and receiving 1000s of snippets of evidence deconstructing ARCANE to show the alleged methods of IP infringements, and after receiving many different complaints, nothing has been officially addressed. The Plaintiff has not received any official serving of any notions from the Defendant and has not had any contact or notifications from the federal court.

Josh Geller arranged a conference call (January 9, 2025). He emailed stating "*Please call the below number on **Thursday, January 9, at 9 a.m. PST / 5 pm UTC**, and I will speak to you then. Please note that the only issues I will be prepared to discuss is the status of your pleadings and Riot's anticipated motion to dismiss. **Dial-in: +1 213 338 8477, Conference ID: 875 004 4670.***" During the call, we did not address my concerns nor prelitigation requests, nor request for an in- person meet and confer. Mr. Geller was pleasant and respectable during the call; he stated that he would "Try" to correctly serve me with all paperwork, notions and other correspondence. Mr. Geller confirmed that he had read my complaints, he had read much evidence, he was aware of my vulnerabilities, he was aware of the case management hearing in district court in April, he noted that I was having trouble accessing the Federal (PACER) system from the UK and he was

1 aware, and again made aware during the call, that a NARRATIVE COMPLAINT (Amended
2 complaint) and a PROOF OF SERVICE BY FIRST-CLASS, and a DEFAULT JUDGMENT,
3 and a DECLARATION OF MARC WOLSTENHOLME In Support of Request for Default
4 Judgment, had all been filed with the district court on JANUARY 8th 2025, and subsequently
5 served on the Defendant via email and service by first-class mail. Mr. Geller responded by
6 saying, “We are still going to proceed with the MOTION TO DISMISS anyway.”
7
8

9 **EXHIBIT CONCLUSION**

10 The Plaintiff can demonstrate many attempts of trying to effectively communicate with the
11 defendant which Plaintiff alleges has been exacerbated by a lack of cooperation to build
12 technicalities and to exploit the Plaintiff’s vulnerabilities, disabilities and learning difference of
13 Dyslexia and the disadvantage of being a Plaintiff in Pro Per against a powerful and experienced
14 defendant in a foreign country. Plaintiff alleges that the MOTION TO DISMISS and the
15 corresponding DECLARATION of counsel is not a true reflection of the case and has been
16 purposely constructed to build a false narrative of the case and of the complaints filed. The
17 plaintiff alleges, with evidence, that this was a rehearsed and conspired and threatening bullying
18 legal diversion to circumnavigate the complaints and to evade proper lawful processes.
19

20 The Plaintiff feels vulnerable, disadvantaged and emotionally harmed by Riot Games, the alleged
21 spurious IP wars they have been involved in every year since 2015, the toxic and threatening
22 community and cultural climate they foster, Christian Linke of Riot Games condoning murder on
23 social media and the legal conduct of the fee earner Defendant who is alleged to be playing bad
24 faith legal games to exasperate and prolong proceedings.
25
26

1 JANUARY 11, 2025 *M. Wolstenholme.*

2 The Plaintiff, Marc Wolstenholme, M.W. Wolf.
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